

Craig W. Straub (SBN 249032)  
craig@crosnerlegal.com  
Lilach H. Klein (SBN 323202)  
lilach@crosnerlegal.com  
Michael T. Houchin (SBN 305541)  
mhouchin@crosnerlegal.com  
Zachary M. Crosner (SBN 272295)  
zach@crosnerlegal.com  
CROSNER LEGAL, P.C.  
9440 Santa Monica Blvd. Suite 301  
Beverly Hills, CA 90210  
Tel: (866) 276-7637  
Fax: (310) 510-6429

*Attorneys for Plaintiffs Adina Ringler,  
Krista Robles, Jay Smith, and Jana  
Rabinowitz*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ADINA RINGLER, KRISTA ROBLES,  
JAY SMITH, and JANA RABINOWITZ,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

THE J.M. SMUCKER COMPANY,

Defendant.

Case No. 2:25-cv-01138-AH-E

Hon. Anne Hwang

**STIPULATION TO MODIFY  
SCHEDULING ORDER**

Complaint filed: February 10, 2025  
Current Trial Date: August 4, 2026

**TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF  
RECORD:**

Plaintiffs Adina Ringler, Krista Robles, Jay Smith, and Jana Rabinowitz (“Plaintiffs”) and Defendant The J.M. Smucker Company (“Smucker” and collectively, the “Parties”) by and through their undersigned counsel of record, hereby agree and stipulate to modify the Court’s July 31, 2025, Civil Pretrial Schedule and Trial Order (ECF No. 38, the “Scheduling Order”) for the reasons stated below.

**WHEREAS**, this Stipulation is accompanied by a declaration from Plaintiffs’ counsel setting forth the specific reasons for the requested continuance as required by the Court’s Standing Order (ECF No. 12 at ¶ 3). Defendant will file a declaration from its counsel following the filing of this Stipulation;

**WHEREAS**, on July 31, 2025, the Court entered the Scheduling Order in the above-captioned action (the “Action”) (ECF No. 38 at 3);

**WHEREAS**, on October 29, 2025, the Court held a hearing and advised counsel to meet and confer regarding modification of the Scheduling Order and noted during the hearing that the Court would grant a reasonable modification to the Scheduling Order, including a briefing schedule for Plaintiffs’ forthcoming motion for class certification (*see* ECF No. 62);

**WHEREAS**, pursuant to Civil Local Rule 7-3, the Parties met and conferred regarding modification of the Scheduling Order and agreed on an extension of deadlines to allow the Parties to respond to additional discovery requests, meet and confer on the ongoing discovery disputes, produce documents in accordance with the agreed upon scope of discovery, and prepare for and conduct Fed. R. Civ. P. 30(b)(6) depositions and percipient witness depositions;

**WHEREAS**, the Parties further acknowledge that additional time is needed to retain and consult with experts in connection with class certification issues, including experts in consumer perception, marketing, and labeling, who require access to relevant discovery materials;

**WHEREAS**, to date, Defendant has been working on collecting documents for production, has produced, among other things, product labels, and documentation relating to the supplier of the citric acid used in the Products at issue, and is in the process of making additional productions of responsive, non-privileged documents;

**WHEREAS**, the Parties have not previously requested the Court to modify the Scheduling Order through stipulation;

**WHEREAS**, under Fed. R. Civ. P. 6(b)(1)(A), “the court may, for good cause, extend the time with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires”; and

**WHEREAS**, for the reasons stated above, as detailed in the concurrently filed declarations from counsel for the Parties, good cause exists for the Court to grant this Stipulation.

**NOW THEREFORE, THE PARTIES HEREBY AGREE AND STIPULATE AND JOINTLY REQUEST THE FOLLOWING<sup>1</sup>:**

<b>Trial and Pretrial Dates</b>	<b>Original Deadline</b>	<b>Defendant’s Proposed Dates</b>	<b>Plaintiffs’ Proposed Dates</b>	<b>Stipulated Deadline</b>
Jury Trial  <u>Note</u> : Any requests for additional trial days must be made at the time of the deadline for Trial Filings (First Round). The Court will make a final determination on the days needed for trial at the FPTC.	August 4, 2026 [Tuesday] at 8:30 a.m.	Agreed	Agreed	<b>May 4, 2027</b>
Final Pretrial Conference [L.R. 16], Hearing on Motions <i>in Limine</i>	July 15, 2026	Agreed	Agreed	<b>April 14, 2027</b>

<sup>1</sup> See Declaration of Ronald Y. Rothstein (explaining basis for Defendant’s proposed schedule).

1	<u>Note:</u> All hearings shall				
2	be on Wednesdays at				
3	1:30 p.m. By default, all				
4	hearings shall proceed in				
5	person, unless a request				
6	is made by the parties.				
7	Last Date to <u>Hear</u>		N/A	N/A	
8	Motion to Amend	September			<b>Deadline</b>
9	Pleadings or Add Parties	17, 2025			<b>Has Passed</b>
10	[Wednesday]				
11	Class Certification		And	March 25,	
12	Motion Deadline	November	Deadline to	2026	<b>March 25,</b>
13		12, 2025	Complete		<b>2026</b>
14			Any Expert		
15			Reports		
16			Upon Which		
17			Plaintiffs		
18			Rely in Their		
19			Motion		
20			March 25,		
21			2026		
22	Fact Discovery Cutoff				
23	<u>Note:</u> Any motions to	March 11,	February 23,	December	
24	compel must be filed and	2026	2026	9, 2026	<b>Could Not</b>
25	heard before the				<b>Agree</b>
26	discovery cutoff.				
27	[Defendant's Requested	N/A	July 8, 2026	Per Code	<b>Could Not</b>
28	Event] -- Opposition to				<b>Agree</b>
	Class Certification				
	Motion Deadline,				
	Deadline to Complete				
	Any Expert Reports				
	Upon Which Defendant				
	Relies in Its Motion, and				
	Deadline to File Any				
	<i>Daubert</i> Motions <sup>2</sup> as to				
	Plaintiffs' Experts				

1	[Defendant's Requested Event] --Deadline to Complete Depositions and Document Productions for Plaintiffs' Experts Re Class Certification	N/A	July 8, 2026	See Expert Discovery Cutoff Date	<b>Could Not Agree</b>
2					
3					
4					
5					
6	[Defendant's Requested Event] -- Reply in Support of Class Certification Motion Deadline, Deadline to Complete Any Rebuttal Expert Reports Upon Which Plaintiffs' Rely in Their Motion, and Deadline to File Any <i>Daubert</i> Motions as to Defendant's Experts	N/A	August 7, 2026	Per Code	<b>Could Not Agree</b>
7					
8					
9					
10					
11					
12					
13					
14	[Defendant's Requested Event] --Deadline to Complete Depositions and Document Productions for Defendant's Experts Re Class Certification	N/A	August 7, 2026	See Expert Discovery Cutoff Date	<b>Could Not Agree</b>
15					
16					
17					
18					
19	Expert Disclosure (Initial)	March 25, 2026		Sept. 9, 2026	<b>Could Not Agree</b>
20					
21	Expert Disclosure (Rebuttal)	April 8, 2026		Oct. 7, 2026	<b>Could Not Agree</b>
22					
23					
24	Expert Discovery Cutoff	April 15, 2026	Aug. 7, 2026	Dec. 9, 2026	<b>Could Not Agree</b>
25					
26	Last Date to Hear Motions [Wednesday]	April 22, 2026	Agreed	Agreed	<b>January 20, 2027</b>
27					
28					

1	Deadline to Complete Settlement Conference via Private Mediation [L.R. 16-15]	June 10, 2026	Agreed	Agreed	<b>March 10, 2027</b>
4	Trial Filings (first round) <ul style="list-style-type: none"> <li>• Motions in Limine</li> <li>• Memoranda of Contentions of Fact and Law [L.R. 16-4]</li> <li>• Joint Witness List</li> <li>• Joint Exhibit List [L.R. 16-6.1]</li> <li>• Joint Status Report Regarding Settlement</li> <li>• Proposed Findings of Fact and Conclusions of Law [L.R. 52] (bench trial only)</li> <li>• Declarations containing Direct Testimony, if ordered (bench trial only)</li> <li>• Requests for judicial notice</li> </ul> <p><u>Note:</u> All trial filings must be filed as well as emailed in Word version to the chambers email box at AH <a href="mailto:Chambers@cacd.uscourts.gov">Chambers@cacd.uscourts.gov</a>. Each party may file no more than five (5) motions <i>in limine</i> without seeking leave from the Court.</p>	June 17, 2026	Agreed	Agreed	<b>March 17, 2027</b>
26	Trial Filings (second round) <ul style="list-style-type: none"> <li>• Oppositions to Motions in Limine</li> </ul>	July 1, 2026	Agreed	Agreed	<b>March 31, 2027</b>

- |    |                          |  |  |  |  |
|----|--------------------------|--|--|--|--|
| 1  | • Joint Proposed Final   |  |  |  |  |
| 2  | Pretrial Conference      |  |  |  |  |
| 3  | Order [L.R. 16-7]        |  |  |  |  |
| 4  | • Joint Agreed Upon      |  |  |  |  |
| 5  | Proposed Jury            |  |  |  |  |
| 6  | Instructions (jury trial |  |  |  |  |
| 7  | only)                    |  |  |  |  |
| 8  | • Disputed Proposed      |  |  |  |  |
| 9  | Jury Instructions (jury  |  |  |  |  |
| 10 | trial only)              |  |  |  |  |
| 11 | • Joint Proposed         |  |  |  |  |
| 12 | Verdict Forms (jury      |  |  |  |  |
| 13 | trial only)              |  |  |  |  |
| 14 | • Joint Proposed         |  |  |  |  |
| 15 | Statement of the Case    |  |  |  |  |
| 16 | (jury trial only)        |  |  |  |  |
| 17 | • Proposed Voir Dire     |  |  |  |  |
| 18 | Questions, if any        |  |  |  |  |
| 19 | (jury trial only)        |  |  |  |  |
| 20 | • Evidentiary            |  |  |  |  |
| 21 | Objections to            |  |  |  |  |
| 22 | Declarations of Direct   |  |  |  |  |
| 23 | Testimony (bench         |  |  |  |  |
| 24 | trial only)              |  |  |  |  |
| 25 | • Table of challenged    |  |  |  |  |
| 26 | exhibits                 |  |  |  |  |
| 27 | • Deposition             |  |  |  |  |
| 28 | designations as to       |  |  |  |  |
|    | which the parties        |  |  |  |  |
|    | have any dispute or      |  |  |  |  |
|    | objection                |  |  |  |  |

**IT IS SO STIPULATED AND AGREED.**

Dated: November 7, 2025

CROSNER LEGAL, P.C.

By: /s/ Craig W. Straub

Craig W. Straub

Lilach H. Klein

Michael T. Houchin

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Zachary M. Crosner

*Attorneys for Plaintiffs Adina Ringler,  
Krista Robles, Jay Smith, and Jana  
Rabinowitz*

Dated: November 7, 2025

WINSTON & STRAWN LLP

By: /s/ Ronald Y. Rothstein  
Ronald Y. Rothstein (*pro hac vice*)  
Jared R. Kessler (*pro hac vice*)  
Shawn R. Obi

*Attorneys for Defendant  
The J.M. Smucker Company*



**ATTESTATION**

Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filer attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content, and have authorized the filing.

Dated: November 7, 2025

CROSNER LEGAL, P.C.

By: /s/ Craig W. Straub

Craig W. Straub

*Attorneys for Plaintiffs Adina Ringler,  
Krista Robles, Jay Smith, and Jana  
Rabinowitz*